February 14, 2023

Chairman Rick Lopes
Chairman Joseph Gresko
Vice-Chairman Jan Hochadel
Vice-Chairman Christine Palm
Environment Committee
Legislative Office Building, Room 3200
Hartford, CT 06106

Re: SB 962 – Prohibiting Use of Second-Generation Rodenticides & SB 963 - Restricting Use of Neonicotinoid Pesticides for Non-Agricultural Use

Dear Chairman Lopes, Chairman Gresko, Vice-Chairman Hochadel, Vice-Chairman Palm and Members of the Environment Committee:

The Connecticut Pest Control Association (CTPCA), the only statewide trade group representing the structural pest industry in the state of Connecticut, appreciates the opportunity to share our thoughts on SB 962 and 963, as we want to be constructive in the policymaking process. **We want to make it clear that we applaud the Committee's efforts to protect pollinators and wildlife in Connecticut.**

SB 962 – Prohibiting Use of Second-Generation Rodenticides

Members in our industry service numerous settings in the state, including homes, rental properties, hospitals, senior centers, food processing facilities, grocery stores, and hotels. The members of CTPCA are fully committed to providing quality pest management services at an affordable price that protect public health, food, and property. Our licensed and trained applicators use Second-Generation Anticoagulant Rodenticides (SGARs) in and around structures to protect the public's health and property from rodents. These products are only applied in self-contained rodent bait stations, as not to allow children or non-target animals from being able to enter and retrieve this bait.

Connecticut has a prevalence of house mice. These pests are found in buildings more often than rats because they can fit through a hole one-fourth of an inch or larger—about the width of a pencil. Once they find a way inside, mice will make their nests in and around the home to be close to a dependable food source because once they settle, they will not travel far away from their nest. Most services done by professional

pest control operators in our state is for house mice, and more often than not these services take place in single family residences, multi-family housing, and small businesses like restaurants. Female house mice can have up to six pups every three weeks and can give birth to a second liter as early as 25 days after the first. In one year, they can give birth to approximately 35 babies. Second Generation Rodenticides are essential to quickly get house mouse populations under control.

Pest management professionals employ a comprehensive integrated management strategy to control rodents. This includes a thorough inspection of the property, mechanical changes, pest proofing suggestions, and monitoring. When rodent populations need to be reduced and eliminated in a timely manner, our industry uses second generation rodenticides in a judicious manner, ensuring that they are placed in areas inaccessible to consumer and non-target wildlife populations. In the absence of SGARs, our professionals would turn towards using significantly less effective methods that include mouse traps and glue traps. These traps are capable of ensnaring only one rodent at a time, and once caught, the entire trap needs to be replaced to capture another, which requires professionals to increase their visits to the site. However, using SGARs allows pest management professionals to check stations monthly. With the other traps, our members will have to monitor them weekly. Both of these conditions increase the cost of pest management for residents and would negatively impact lower income households who won't be able to afford these alternative methods.

SGARs are essential because there are currently no viable alternatives to rodenticides. Rodenticides are necessary because of the vital need to manage rodent infestations due to the bacteria, viruses, and other disease-causing pathogens that they can transmit to humans. According to the U.S. Centers for Disease Control and Prevention (CDC), rodents transmit over 35 diseases such as hantavirus, rat bite fever, trichinosis, plague, infectious jaundice, Weil's disease, and leptospirosis. Leptospirosis results in an estimated 1.03 million annual cases and 58,900 deaths around the world. While many deaths caused by leptospirosis occur in the developing world, the United States is not immune, as three people in New York City were infected in 2017, resulting in one death. Additionally, there was a marine typhus outbreak in LA County in October of 2018 that was contained with the help of rodenticides.

Furthermore, SB 962 bans the use of the most effective and affordable means of preventing rat infestations. The impact of this ban will fall heavily on urban and suburban neighborhoods, with higher population densities where rats are able to have access to food sources commonly found in unsecured trash bins. Additionally, with inflation running at all-time highs, the cost of using fewer effective products and more frequent visits by pest management professionals will likely lead to more expensive rodent control measures for citizens and businesses of our state.

I would also like to point out to the committee that the U.S. EPA is currently evaluating all rodenticides as part of their product review cycle. Just last month, a proposed interim decision was released by the Agency that would classify these products as restricted use, allowing only certified applicators, like pest management professionals the ability to use these products due to the testing and training our industry receives. The comment closing period for this proposed interim decision was February 13, 2023, and we feel that any actions taken, should be done so by the agency that has the expertise, resources and career staff in this field. We ask that Connecticut not get ahead of the science and respectfully request this bill be held until the Agency has released its final decision on all rodenticides.

In conclusion, SB 962 is a bill that is premature and leapfrogs the current regulatory processes being reviewed at EPA. It has the potential to pick winners and losers in our state with all the included exemptions, allowing breweries and wineries the ability to use these products but prohibiting low income residents from protecting their families and their homes with affordable pest control. It will likely lead to a downturn in tourism, negative impact on restaurants, senior centers, and places where residents live, work, and play. I ask you to consider this when voting on this bill and come to the consensus that at this time, it is premature to make a statewide decision to ban second-generation rodenticides. CTPCA is open and willing to engage in a constructive dialogue with state legislators to come up with a plan to safeguard our wildlife while also safeguarding the health of our citizens. **I respectfully ask for your opposition to SB 962.**

SB 963 - Restricting Use of Neonicotinoid Pesticides – CTPCA Supports Provisions that Permit Professional Structural Pest Control Uses of Neonicotinoid Pesticides

The professional structural pest industry professionally manages structural pests with neonicotinoids such as ants, bed bugs, carpenter ants, cockroaches, flies, termites, and many others. We acknowledge that SB 963 is not targeted at our industry, as our uses are unlikely to impact pollinators and we really appreciate the indoor exemption for our industry in the bill. We ask that you also consider amending the language to include "and outdoor structural" on line 15 after the word "indoor."

It is known that structural pest control uses of neonicotinoid pesticides are unlikely to pose a threat to pollinators, as a recent Cornell University study on neonicotinoid pesticides illustrates. As many services are performed inside or directly adjacent to a structure, professional pest control does not pose a large risk to pollinators. Additionally, NPMA and the pest control industry crafted comprehensive BMPs that have been in practice to protect pollinators, in addition to free online training offered to service professionals.

CTCPA stresses the impact that the structural pest management industry has on pollinators is nominal. Pesticide risks to pollinators are not only focused on the toxicity of a chemical, but also the potential for exposure. Structural pest control is very unlikely to lead to exposure. Similarly, exterior treatments applied to the structure and other areas around the structure are also unlikely to result in significant exposure. CTPCA members support, teach, and implement Best Management Practices (BMPs) developed by the National Pest Management Association, which greatly increases the ability of our members to safely use pesticides in a manner that doesn't impact pollinators.[1]

In conclusion, we cannot support this bill as written and would respectfully ask for your opposition to the bill. However, if the Committee considers amending the language, we mentioned above to ensure our industry can continue to protect both human and pollinator health, we would remain neutral on this bill.

Conclusion

Thank you for taking our concerns and suggestions into consideration. We want to be constructive in the policymaking process and applaud your efforts to protect wildlife and pollinators. Thank you for the opportunity to inform the Joint Committee on Environment as to how the professional pest control industry protects public health and property with both second-generation anticoagulant and neonicotinoid pesticides in a manner that is unlikely to threaten non-target organisms. Do not

[1] NPMA Pollinator Best Management Practices (BMPs), http://www.multibriefs.com/briefs/npma/PollinatorBMPsFINAL.pdf

hesitate to contact me at agiovanni@nopests.com if you have any questions and would like to discuss further.

Sincerely,

Anthony Giovanni ACE
agiovanni@nopests.com
Director
Connecticut Pest Control Association